

1 STUART F. DELERY  
Principal Deputy Assistant Attorney General  
2 MELINDA HAAG  
United States Attorney  
3 ALEX TSE  
Chief, Civil Division  
4 JOHN R. TYLER  
Assistant Branch Director  
5 CAROLINE LEWIS WOLVERTON  
District of Columbia Bar No. 496433  
6 Senior Counsel  
Civil Division, Federal Programs Branch  
7 U.S. Department of Justice  
P.O. Box 883  
8 Washington, D.C. 20044  
Telephone: (202) 514-0265  
9 Facsimile: (202) 616-8470  
E-mail: caroline.lewis-wolverton@usdoj.gov

10 Attorneys for Defendant LEON PANETTA

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 MARY JENNINGS HEGAR, JENNIFER HUNT,  
16 ALEXANDRA ZOE BEDELL, COLLEEN  
17 FARRELL, and SERVICE WOMEN'S ACTION  
NETWORK,

18 Plaintiffs,

19 v.

20 LEON PANETTA, Secretary of Defense,

21 Defendant.  
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Case No. C 12-06005 EMC

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE INITIAL  
CASE MANAGEMENT  
CONFERENCE SET FOR  
FEBRUARY 28, 2013 AND ADR  
DEADLINES**

1  
2 Defendant Leon Panetta, Secretary of Defense (“Secretary”) and Plaintiffs Mary  
3 Jennings Hegar, Jennifer Hunt, Alexandra Zoe Bedell, Colleen Farrell, and Service  
4 Women’s Action Network (collectively, “the parties”), by and through their respective  
5 counsel, hereby stipulate as follows:

6 1. On November 27, 2012, Plaintiffs filed their Complaint for Declaratory and  
7 Injunctive Relief challenging as unconstitutional the 1994 direct ground combat definition  
8 and assignment rule, and the Court issued the Order Setting Initial Case Management  
9 Conference and ADR Deadlines establishing the following scheduling dates:

11 2/7/2013 Last day to: meet and confer re: initial disclosures, early settlement,  
12 ADR process selection, and discovery plan; file ADR Certification  
13 signed by Parties and Counsel; file either Stipulation to ADR Process  
14 or Notice of Need for ADR Phone Conference

15 2/21/2013 Last day to file Rule 26(f) Report, complete initial disclosures or state  
16 objection in Rule 26(f) Report, and file Case Management Statement  
17 per the Court’s Standing Order re Contents of Joint Case  
18 Management Statement

19 2/28/2013 Initial Case Management Conference

20 21 3. On January 24, 2013, the Secretary rescinded the 1994 direct ground combat  
22 definition and assignment rule and directed the Military Services to submit plans to him by  
23 May 15, 2013, for implementation of this policy change;

24 25 4. In light of the above, on January 29, 2013, the parties filed a stipulation with  
26 the Court agreeing to meet and confer within three weeks of the deadline for submitting the  
27 implementation plans and to allow the Secretary thirty (30) days after that meet and confer  
28 to respond to the Complaint;

1  
2           5.       The parties now request that the Court continue the scheduling dates  
3 established by the November 27, 2012 Order so that they will occur after the parties meet  
4 and confer following the May 15, 2013 deadline for the Military Services' submission of  
5 their implementation plans. Specifically, the parties request that: the February 7, 2013  
6 deadline for them to meet and confer and to file ADR-related materials be continued to June  
7 15, 2013; that the Initial Case Management Conference be continued from February 28,  
8 2013 to July 18, 2013, which is seventeen days after the Secretary's response to the  
9 Complaint is due; and that the deadline for the parties' Rule 26(f) Report, initial disclosures  
10 or statement of objection in Rule 26(f) Report, and Case Management Statement be  
11 continued to July 11, 2013.  
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13           ACCORDINGLY, the parties respectfully request that the Court revise the initial  
14 case management conference and ADR deadlines set forth in the November 27, 2012 Order  
15 as follows:  
16

17	6/15/2013	Last day to: meet and confer re: initial disclosures, early settlement,
18		ADR process selection, and discovery plan; file ADR Certification
19		signed by Parties and Counsel; file either Stipulation to ADR Process
20		or Notice of Need for ADR Phone Conference
21	7/11/2013	Last day to file Rule 26(f) Report, complete initial disclosures or state
22		objection in Rule 26(f) Report, and file Case Management Statement
23		per the Court's Standing Order re Contents of Joint Case
24		Management Statement
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26	7/18/2013	Initial Case Management Conference
27		
28		

IT IS SO STIPULATED.

DATED: February 7, 2013

MUNGER, TOLLES & OLSON LLP

STUART F. DELERY  
Principal Deputy Assistant Attorney General  
MELINDA HAAG  
United States Attorney  
ALEX TSE  
Chief, Civil Division  
JOHN R. TYLER  
Assistant Branch Director

*/s/ Rosemarie T. Ring*

*/s/ Caroline Lewis Wolverton*

ROSEMARIE T. RING  
Attorneys for Plaintiffs  
(Electronic signature authorized  
verbally to counsel)

CAROLINE LEWIS WOLVERTON  
U.S. Department of Justice  
Attorneys for Defendant

PURSUANT TO STIPULATION, IT IS SO ORDERED.

The initial case management conference and ADR deadlines are revised as follows:

6/15/2013 Last day to: meet and confer re: initial disclosures, early settlement,  
ADR process selection, and discovery plan; file ADR Certification  
signed by Parties and Counsel; file either Stipulation to ADR Process  
or Notice of Need for ADR Phone Conference

7/11/2013 Last day to file Rule 26(f) Report, complete initial disclosures or state  
objection in Rule 26(f) Report, and file Case Management Statement  
per the Court's Standing Order re Contents of Joint Case  
Management Statement

7/18/2013 Initial Case Management Conference

DATED: 2/8, 2013

Edward M. Chen  
United States District Judge

